

Reply Exhibit JLT-1:
Matrix Showing Qwest's Previous Responses
to Parties' Primary Arguments That Are Raised Once Again in This Proceeding

Summary of Argument	Party/Cite	Summary of Response ¹	Qwest Cite
COLORADO LOOPS			
The loop rates set by the CPUC are excessive and based on non-TELRIC inputs.	AT&T Br. (<i>Qwest I</i>) 62-64; AT&T Fasset & Mercer Decl. ¶¶ 24-72.	The loop rates are no higher than the low end of TELRIC-reasonableness, and, in adopting those rates, the CPUC made no TELRIC errors about which CLECs can complain.	Reply Br. (<i>Qwest I</i>) 98; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 43-53, 60-63; Qwest <i>I ex parte</i> 081202a
The network operations expenses that the CPUC adopted are too high.	AT&T Br. 71-73; AT&T Fasset & Mercer Decl. ¶¶ 61-64.	The CPUC correctly adopted a 4% reduction to network operations expenses in the HAI model, rather than the 50% factor proposed by AT&T.	Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 64-67. (See also the instant Declaration, ¶¶ 6-14)
The Colorado loop rates overstate cable lengths because the CPUC did not use the optional strand distance normalization (SDN) (or minimum spanning tree (MST)) function within the HAI model.	AT&T Br. (<i>Qwest I</i>) 62; AT&T Fasset & Mercer Decl. ¶¶ 48-51.	The CPUC correctly decided to use the HAI model's default cable routing methodology, rather than the MST function.	Reply Br. (<i>Qwest I</i>) 98; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 55-58
COLORADO SWITCHING			
The switching rates adopted by the CPUC are excessive and based on non-TELRIC inputs, factors, and assumptions.	AT&T Chandler & Mercer Decl. ¶¶ 17, 19-42.	As adjusted previously in these proceedings, Qwest's switching rates are no higher than the low end of TELRIC-reasonableness.	Reply Br. (<i>Qwest I</i>) 94-97; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 30-36, 38-41; Qwest <i>I ex parte</i> 072202

¹ This is a non-exhaustive list of the issues and Qwest's responses. In particular, it does not reiterate the various respects in which many of the parties' arguments are unfounded and erroneous. Please see prior Qwest submissions for full responses.

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NON-RECURRING CHARGES			
Qwest's non-recurring charges in Colorado and elsewhere are excessive.	AT&T Baker, Starr & Denney Decl. ¶¶ 49-53.	Qwest's NRCs are TELRIC-compliant and well within the range of NRCs approved by the FCC in other Section 271 proceedings.	Reply Br. (<i>Qwest I</i>) 92-94; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 3-29; Qwest I <i>ex parte</i> 072402b
BENCHMARKING			
Qwest's benchmarked rates are flawed, due to (i) the Synthesis Model's flaws, (ii) Qwest's use of standardized rather than state-specific minutes of use, (iii) analysis of switching and transport rates together on an aggregated basis, and other factors. The pre-benchmarked rates in the states other than Colorado do not comply with TELRIC.	AT&T Br. 73-77; AT&T Baker, Starr & Denney Decl.; AT&T Chandler & Mercer Decl. ¶¶ 43-73; AT&T Fassett & Mercer Decl. ¶¶ 73-132; AT&T Lieberman/Pitkin Decl. ¶¶ 8-20; WCom Br. 25-26; Integra Br. 3-6, 8-14.	Qwest's recurring and non-recurring rates for elements included in UNE-P in the eight states other than Colorado are equivalent to or lower than the rates established by the CPUC, as adjusted using the Synthesis Model pursuant to the FCC's established benchmarking methodology.	Reply Br. (<i>Qwest I</i>) 103-05; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 80-89; Reply Br. (<i>Qwest II</i>) 88-92, 98 n.71; Thompson Reply Decl. (<i>Qwest II</i>) ¶¶ 5-43; Qwest III <i>ex parte</i> 100702; Qwest II <i>ex partes</i> 083002d, 082102b, 081902c, 081502c; Qwest I <i>ex partes</i> 080802d, 080502a, 072402b, 072202.
LINE SHARING			
Positive charges for the HFPL violate the applicable pricing rules, are discriminatory, and result in double-recovery.	Covad Br. 3-12, 14; WCom Br. 26.	Qwest's HFPL rates are reasonable and comply with applicable FCC policies. In any event, to avoid controversy and expedite these proceedings, Qwest reduced and deaveraged its HFPL rates in certain states.	Reply Br. (<i>Qwest I</i>) 99-101; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 69-74; Reply Br. (<i>Qwest II</i>) 101-03; Thompson Reply Decl. (<i>Qwest II</i>) ¶¶ 59-62; Qwest II <i>ex parte</i> 081502c; Qwest I <i>ex parte</i> 072402b; Qwest I <i>ex parte</i> 072202

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COLLOCATION RATES			
Qwest's collocation rates in various states, including quote preparation fees (QPFs) for collocation augments, are excessive.	AT&T Baker, Starr & Denney Decl. ¶¶ 33, 54; OneEighty Br. 8.	As adjusted, Qwest's collocation rates are reasonable and TELRIC-compliant.	Reply Br. (<i>Qwest I</i>) 107; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 98-100; Qwest I <i>ex parte</i> 072402b; Qwest I <i>ex parte</i> 072202.
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MISCELLANEOUS PRICING			
Qwest's transport entrance facility charges are inappropriate.	AT&T Br. 80	Qwest's transport rate structure is appropriate and consistent with Commission precedent.	Reply Br. (<i>Qwest I</i>) 108; Thompson Reply Decl. (<i>Qwest I</i>) ¶¶ 106-112; Qwest I <i>ex parte</i> 072402b; Qwest I <i>ex parte</i> 072202
Qwest has failed to comply with the FCC's new services test pricing requirements for payphone services.	Payphone Associations Br. 4-9	Payphone access line rates are beyond the scope of Section 271 proceedings.	Reply Br. (<i>Qwest II</i>) 103 n.75; Qwest II <i>ex parte</i> 081502c; Qwest I <i>ex parte</i> 072402b
The Montana and Wyoming deaveraging methodologies are inappropriate and lead to anticompetitive results.	AT&T Lieberman/Pitkin Decl. ¶ 49	The deaveraging approaches used by both states are consistent with FCC rules and create no plausible opportunity for anticompetitive conduct.	Reply Br. (<i>Qwest II</i>) 98-100; Thompson Reply Decl. (<i>Qwest II</i>) ¶¶ 55-56; Qwest II <i>ex parte</i> 083002d
PRICE SQUEEZE			
The narrow margins between Qwest's rates and the revenues available to CLECs preclude competitive entry.	AT&T Br. 78-79; WCom Br. 25-26; Integra Br. 6-7, 14-15.	Opposing parties' arguments are flawed on both legal and factual grounds.	Reply Br. (<i>Qwest II</i>) 116-22; Reply Br. (<i>Qwest I</i>) 119-24; Thompson Reply Decl. (<i>Qwest II</i>) ¶¶ 68-100; Qwest II <i>ex parte</i> 081502c; Qwest I <i>ex parte</i> 072402b; Qwest I <i>ex parte</i> 072202